

# United States District Court

for the  
Western District of New York

United States of America

v.

Case No. 23-MJ-24-HKS

**KHALED ABUGHANEM,  
WALEED ABUGHANEM, and**  
[REDACTED]

*Defendants*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

From on or about September 1, 2021, the exact date being unknown, until present, in the Western District of New York, and elsewhere within the jurisdiction of the United States, the defendants, KHALED ABUGHANEM, WALEED ABUGHANEM, and [REDACTED] and others, known and unknown, knowingly, intentionally, and willfully combined, conspired, confederated, and joined in agreement together and with each other, to commit one or more acts, at a place outside the United States, that would constitute the offense of kidnapping if committed in the special maritime and territorial jurisdiction of the United States, and one or more of the conspirators did commit one or more acts within the jurisdiction of the United States to effect any object of the conspiracy.

All in violation of Title 18, United States Code, Section 956(a)(1).


This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me telephonically.

Date: February 13, 2023

City and State: Buffalo, New York



*Complainant's signature*

EDMUND SUSMAN  
TASK FORCE OFFICER  
FEDERAL BUREAU OF INVESTIGATION

*Printed name and title*



*Judge's signature*

HON. H. KENNETH SCHROEDER, JR.  
UNITED STATES MAGISTRATE JUDGE

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

STATE OF NEW YORK     )  
COUNTY OF ERIE        )     SS:  
CITY OF BUFFALO        )

I, EDMUND SUSMAN, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent for the Department of State, Diplomatic Security Service. Since December 2021, I have served as a Task Force Officer (TFO) to the Federal Bureau of Investigation (FBI) Joint Terrorism Task Force (JTTF) at the Buffalo Division located within the Western District of New York. As such, I am an “investigative or law enforcement officer of the United States” within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516.

2. This affidavit is submitted in support of a Criminal Complaint charging KHALED ABUGHANEM, WALEED ABUGHANEM, and [REDACTED] with a violation of Title 18, United States Code, Section 956(a)(1) (Conspiracy to Kidnap Persons in a Foreign Country).

3. The statements contained in this affidavit are based upon my investigation and personal knowledge, my review of official documents and records, and information communicated to me by other law enforcement agents and government officials. Because this affidavit is being submitted for the limited purpose of securing search warrants, I have not included each and every fact known to me concerning this investigation. Unless

specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

**RELEVANT STATUTE**

4. Title 18, United States Code, Section 956(a)(1) states as follows:

Whoever, within the jurisdiction of the United States, conspires with one or more other persons, regardless of where such other person or persons are located, to commit at any place outside the United States an act that would constitute the offense of murder, kidnapping, or maiming if committed in the special maritime and territorial jurisdiction of the United States shall, if any of the conspirators commits an act within the jurisdiction of the United States to effect any object of the conspiracy, [is guilty of a crime].

**PROBABLE CAUSE**

5. Since approximately December 1, 2022, I have been investigating the circumstances surrounding, and reasons for, the travel of an adult American citizen, "Victim 1," to Yemen. As described below, the investigation to date has provided probable cause to believe that Victim 1 was tricked into traveling from the Buffalo, New York, area to Yemen. The investigation has further provided probable cause to believe that Victim 1's father and brothers—the defendants, KHALED ABUGHANEM, WALEED ABUGHANEM, and [REDACTED]—have attempted to force her to marry a person not of her choosing and have further discussed killing her if she does not abide by her father and brothers' wishes.

6. The facts described in this affidavit come from several sources, including the following:



- a. A report provided to the FBI by Victim 1's fiancé, ("Fiancé 1");
- b. A not-for-profit organization, which has advocated on behalf of Victim 1, provided the FBI with substantial information describing the circumstances surrounding Victim 1's removal from the United States. To date, the FBI has not been able to corroborate all information provided by this organization. However, information provided by the organization has been consistent with other information obtained from other sources throughout the course of the investigation;
- c. Email communications between your affiant and a person who I have reasonably confirmed to be Victim 1; and
- d. Records from U.S. Customs and Border Protection (CBP).

**A. Victim 1's Travel to Mexico to Marry Fiancé 1**

7. On or about September 1, 2021, Victim 1 travelled to Mexico to meet Mexican national Fiancé 1. Fiancé 1 and Victim 1 had known each other for almost nine years and were engaged to be married. Victim 1 did not inform her family of her travel to Mexico or her relationship with Fiancé 1.

8. Additionally, on or about September 1, 2021, KHALED ABUGHANEM (Victim 1's father), contacted the Lackawanna Police Department and reported that Victim 1 was missing. Specifically, KHALED ABUGHANEM reported to the Lackawanna Police Department that his other daughter (who was located in Saudi Arabia), had informed him



that Victim 1 had run away to get married. Lackawanna Police Department phone verified with Verizon that Victim 1 had traveled to Guadalajara, Mexico.

9. On or about September 2, 2021, Victim 1 notified KHALED ABUGHANEM of her travel. Also, on or about September 2, 2021, Fiancé 1 called KHALED ABUGHANEM via Skype and informed him that Victim 1 was safe at his home in Mexico. Fiancé 1 informed KHALED ABUGHANEM of his and Victim 1's intention to marry and invited KHALED ABUGHANEM to come to Mexico. KHALED ABUGHANEM feigned approval of the marriage and agreed to come to Mexico to plan a wedding for Fiancé 1 and Victim 1.

10. Between on or about September 2 and 7, 2021, KHALED ABUGHANEM made multiple phone calls to Victim 1, including one call in which he stated, according to Victim 1, in substance, that, he would come to Mexico and that "it will be the end for" Victim 1.<sup>1</sup>

**B. The ABUGHANEM Family's Travel to Mexico to Involuntarily Return Victim 1 to the United States**

11. CBP travel records show that, on or about September 8, 2021, Victim 1's parents—KHALED ABUGHANEM and Victim 1's mother—and one of her brothers, [REDACTED], arrived in Mexico. Multiple phone calls between KHALED

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<sup>1</sup> Quotes contained in this paragraph and throughout this affidavit are taken from email correspondence with Victim 1, and as of the date of this affidavit, have not been able to be verified independently.

ABUGHANEM and Fiancé 1 took place to discuss the details of their meeting. Fiancé 1 initially planned for the families to meet at his mosque with a trusted Imam to discuss the marriage. KHALED ABUGHANEM refused this invitation, reportedly stating, “I will not be taught Islam,” and demanded that they (meaning KHALED ABUGHANEM and Fiancé 1) speak privately.

12. According to Victim 1, during one of the phone calls, she stated to KHALED ABUGHANEM that she wanted to marry Fiancé 1 very soon, and that she wanted to stay in Mexico. KHALED ABUGHANEM suggested that they have dinner and stated that he would agree to what Victim 1 and Fiancé 1 wanted.

13. On or about the evening of September 8, 2021, the ABUGHANEM family (KHALED, Victim 1’s mother [REDACTED] and Victim 1) met with Fiancé 1 and his family at the Palominas Providencia restaurant located in Guadalajara, Mexico. According to Victim 1, KHALED ABUGHANEM addressed the room while Victim 1’s mother begged Victim 1 in Arabic to come to their hotel for one night only “just to make things right, and that they are not going to do anything”.

14. According to Victim 1, while at the restaurant, KHALED ABUGHANEM yelled at Fiancé 1’s family for Victim 1’s actions; he threatened Victim 1’s mother with divorce; and he threatened Victim 1 in Arabic that bad things would happen if she did not come to the hotel. Victim 1 then acquiesced to her mother’s request. The ABUGHANEM family traveled from the restaurant to the hotel via Uber. According to Victim 1, upon arrival

at the hotel, KHALED ABUGHANEM and [REDACTED] stayed in the lobby while Victim 1's mother was ordered to perform a "virginity test" on Victim 1 in the 12<sup>th</sup> floor hotel room. (The test was not performed.)

15. Victim 1 then spoke to KHALED ABUGHANEM and [REDACTED] about her intention to marry Fiancé 1 and return to his home the next day. Victim 1 reported that KHALED ABUGHANEM became furious, stating that he wanted to take Victim 1 to Egypt or Yemen directly from Mexico, and demanded that Fiancé 1's family pay him 30,000 USD. When Victim 1 disagreed, according to her, KHALED ABUGHANEM threatened to throw her from the hotel's 12<sup>th</sup> floor balcony if she did not comply with his orders. According to Victim 1, KHALED ABUGHANEM then stated, "I will have no problem becoming a criminal in this country," and he stated that he knew "hitmen" in Mexico "who can do the job for him." At some point during the evening, KHALED ABUGHANEM booked tickets for Victim 1 and her family to return to the United States on September 10, 2021.

16. On or about the morning of September 9, 2021, KHALED ABUGHANEM realized that Victim 1 did not have her U.S. Passport with her and traveled without warning, via Uber, to Fiancé 1's residence. Fiancé 1's mother arrived at the residence just behind the ABUGHNAEM family and allowed them into the home, which was occupied at the time by Fiancé 1 and his sister. According to Victim 1 and Fiancé 1, once inside the home KHALED ABUGHANEM remained in the living room while Victim 1 went upstairs, with Fiancé 1 and Fiancé 1's sister, to the bedroom where Victim 1 had been staying. Victim 1's mother and



[REDACTED], at KHALED ABUGHANEM's order, then forcibly entered the bedroom and collected Victim 1's belongings and identification documents, which included her U.S. Passport.

17. Victim 1 stated she did not want to leave with them. According to Victim 1, her mother then twisted Victim 1's wrist and forced her downstairs. Once downstairs, KHALED ABUGHANEM prevented Fiancé 1's mother from obtaining Victim 1's passport by hiding it in his shirt in an effort to prevent Victim 1 from staying in Mexico. According to Victim 1, she was then dragged and pushed out of the residence into the Uber to return to the hotel.

18. On or about the evening of September 9, 2021, [REDACTED] called Fiancé 1 to have their families meet at the restaurant Menta Negra, purportedly to discuss Victim 1 and Fiancé 1's future wedding and also suggested that this would be an engagement party. [REDACTED] advised Fiancé 1 to bring any remaining belongings of Victim 1 to the restaurant, as the ABUGHANEM family (including Victim 1) would be returning to the United States the next day. The meeting was attended by KHALED ABUGHANEM, Victim 1's mother [REDACTED], Victim 1, Fiancé 1, and Fiancé 1's family.

19. KHALED ABUGHANEM and Fiancé 1's father discussed a "gentleman's agreement" following the above-described incident at the residence. They agreed that Victim 1 would come to the United States first so that a party could be held, and that he (KHALED

ABUGHANEM) would file for the K-1 Fiancé visa for Fiancé 1 and bring Fiancé 1 to the United States for the marriage. At the restaurant, Fiancé 1 proposed to Victim 1 and presented her with a ring in front of KHALED ABUGHANEM. In addition, Fiancé 1's family presented gifts. According to Victim 1, following the meeting, the ABUGHANEM family returned to the hotel where KHALED ABUGHANEM threw away the gifts and stated that he never intended to allow Victim 1 to follow through on the engagement. KHALED ABUGHANEM forcibly took the engagement ring from Victim 1. KHALED ABUGHANEM then took Victim 1's phone as she was attempting to contact Fiancé 1. When she protested, Victim 1's mother threatened Victim 1 to not make trouble.

20. On or about September 10, 2021, Victim 1 involuntarily departed Mexico at KHALED ABUGHANEM's direction and arrived in Buffalo, NY; the ABUGHANEM family was picked up at the Buffalo International Airport by WALEED ABUGHANEM (Victim 1's other brother) and transported to the family residence in Lackawanna, NY. Upon arrival at the residence, KHALED ABUGHANEM again took Victim 1's phone and, according to Victim 1, changed the Wi-Fi network password for the home to prevent Victim 1 from having Wi-Fi access. According to Victim 1, KHALED ABUGHANEM told Victim 1 that, "she would be traveling outside the United States whether she liked it or not, or he would bury her in the backyard". [REDACTED] (Victim 1's other brother) took Victim 1's laptop and, with the assistance of KHALED ABUGHANEM, systemically changed all Victim 1's passwords to social media and email accounts, then subsequently deleted them, preventing her from any communication with Fiancé 1. Victim 1 asked her

mother why this was happening and her mother stated, according to Victim 1, that they were “not ever going to let her marry Fiancé 1 and lied to just to get her out of Mexico”.

21. According to Victim 1, she attempted to flee the residence only to find that all doors had been locked. KHALED ABUGHANEM then pushed her against the stairs and attempted to hit her but was stopped by WALEED ABUGHANEM. According to Victim 1, KHALED ABUGHANEM also installed a camera inside Victim 1's bedroom to monitor her movement. Additionally, [REDACTED] called the University of Buffalo from his phone and coerced Victim 1 to withdraw herself from the University of Buffalo, where she had been a student. According to Victim 1, she was forced by [REDACTED] to speak into his phone who directed her exactly what to say. [REDACTED] then muted the phone when Victim 1 tried to ask for help. Additionally, [REDACTED] emailed the University of Buffalo while impersonating Victim 1 to complete the withdrawal.

22. According to Victim 1, from on or about September 10 through 20, 2021, Victim 1 was under constant threat of harm, restricted to the ABUGHANEM residence, and not allowed to leave or have any contact with anyone except family. While Victim 1 was restricted to the residence, KHALED ABUGHANEM and Victim 1's mother told her that she must travel with them to Egypt for multiple reasons, including but not limited to:

- a. If she did not travel with them, they would keep her locked in the Buffalo home without contact with the outside world forever. They told her no one would ever help her, including the police;



- b. If she did not travel with them, they would kill her, Fiancé 1, and his family;
- c. If she did not travel with them, they would never agree to her marriage with Fiancé 1; and
- d. If she went to Egypt with them, they would hold a wedding for her and Fiancé 1 in Egypt.

At no point while she was in Buffalo did Victim 1 know that her family planned to traffic her to Yemen for the purposes of a forced marriage to a husband of the family's choosing. Victim 1 was also forced to submit to a "virginity test" conducted by her mother at the direction of KHALED ABUGHANEM. Additionally, according to Victim 1, KHALED ABUGHANEM assaulted Victim 1 during this period of confinement, throwing her into the stairs in a furious rage, which was only stopped by the intervention of her mother and [REDACTED].

### **C. Victim 1's Removal to Yemen and Subsequent Investigation**

23. On or about September 17, 2021, Fiancé 1 called the Lackawanna Police Department stating he had not been able to contact his fiancé, Victim 1, in over a week and believed that KHALED ABUGHANEM and Victim 1's mother were preventing her from calling him. Lackawanna Police responded to the ABUGHANEM residence. Victim 1 reported seeing the officers but was not made aware that they were there for her; she did not have an opportunity to talk to them privately. The officers spoke to KHALED ABUGHANEM and [REDACTED]. The officers advised them to contact Fiancé 1. Following this encounter, KHALED ABUGHANEM and [REDACTED] began working on acquiring tickets to Egypt.

24. On or about September 23, 2021, KHALED ABUGHANEM, Victim 1's mother, [REDACTED] Victim 1's little brother, another of Victim 1's brothers, and Victim 1's little sister (hereafter referred to as the ABUGHANEM family) were driven to Ohio by another of Victim 1's sisters and WALEED ABUGHANEM to board a flight to Dallas, Texas, connecting to a following flight to Doha, Qatar. After dropping off the ABUGHANEM family at an airport in Ohio, WALEED ABUGHANEM and Victim 1's sister did not travel and returned to Buffalo, NY. Upon arrival in Dallas, Victim 1 stated that her family was denied boarding for the flight to Doha, Qatar due to not having the required COVID testing. KHALED ABUGHANEM refused to pay for testing, resulting in the family being denied boarding altogether. As a result, the ABUGHANEM family had to stay at a hotel in Dallas, TX for three days pending approval to fly to Doha, Qatar. During that time, Victim 1 was restricted to the hotel room and unable to leave. On or about September 26, 2021, the ABUGHANEM family arrived at the Dallas Airport.

25. According to Victim 1, she was restricted from accessing any electronic devices, was not allowed to use the restroom by herself, and was under threat of harm by KHALED ABUGHANEM and her mother. That same day, the ABUGHANEM family boarded a flight to Doha, Qatar via Qatari Airlines, with a connection to Cairo, Egypt. Victim 1 stated that she was not allowed to sit by herself or use the screens on the back of the airline seats due to KHALED ABUGHAEM's fear that she would have access to a Wi-Fi connection. The ABUGHANEM family arrived in Cairo, Egypt on or about September 27, 2021, and according to Victim 1, KHALED ABUGHANEM stated to her as they were leaving the

airport that “you are no longer in the West, you are in the Middle East, women like you are killed”.

26. According to Victim 1, from on or about September 27 through October 22, 2021, Victim 1 was held locked in a 7<sup>th</sup> floor apartment at an unidentified location in Cairo, Egypt. The elevator to the building was controlled via a guard posted right next to the elevator, and the elevator itself was controlled via a “chip”. The stairs were blockaded, and the balcony provided no means of escape. Victim 1 attempted to escape several times but was unable to move around Cairo as she did not know how to navigate through the city, nor did she have any money. During this time, Victim 1 kept a written journal of the events that had transpired to date until she got caught writing in the journal. According to Victim 1, her journal was forcibly taken by KHALED ABUGHANEM, who read it. Victim 1 stated that KHALED ABUGHANEM then stated, “these words you wrote can be used as evidence once given to the police, they’re dangerous”. Victim 1 believes that at least portions of the journals were photographed, as she saw them on Khaled ABUGHANEM’s phone.

27. On or about October 21, 2021, the ABUGHANEM family left the apartment for Cairo Airport for onward travel to Aden, Yemen. During this ride to the airport, the family friend who drove the ABUGHANEM family spoke to Victim 1 about a story of a Yemeni father who killed his daughter because she engaged in conduct that was inconsistent with Yemeni culture. Upon arrival at the Cairo Airport, Victim 1 attempted to get help from the ticket agent, but was unsuccessful. Victim 1 then attempted to escape from the waiting area but was prevented from doing so by KHALED ABUGHANEM.



28. On or about October 22, 2021, the ABUGHANEM family arrived in Aden, Yemen, and booked a driver to transport the ABUGHANEM family into the Houthi controlled city of Sanaa, Yemen. According to Victim 1, the ABUGHANEM family was stopped at numerous checkpoints and searched, taking their passports for inspection. Victim 1's passport was taken by soldiers at one of the checkpoints and inspected for 30 minutes.

29. After arriving in Sanaa, Yemen, the ABUGHANEM family stayed in two different apartments before Victim 1 was moved to the location in Sanaa, where she is currently being held by her family. According to Victim 1, on the second or third day, KHALED ABUGHANEM proposed a Houthi wedding for which he (KHALED ABUGHANEM) would be paid 500,000 USD. Victim 1 refused. Victim 1 stated that that is not what she wants, that she will never agree, and that KHALED ABUGHANEM cannot do that to her. According to Victim 1, KHALED ABUGHANEM became enraged at her refusal and screamed "yes I (KHALED ABUGHANEM) can, I am in Yemen now, no one can judge me or hold me accountable". KHALED ABUGHANEM then physically assaulted Victim 1 by whipping her with his belt and strangling her with his hands. According to Victim 1, the bruising was bad enough that she had to hide the bruises on her neck, arms, and back whenever anyone was around. Victim 1 believes she only survived the assault due to the intervention of her mother.

30. On or about November 17, 2021, Fiancé 1 called the Lackawanna Police Department stating that he had not been able to contact his fiancé Victim 1 in two months. The Lackawanna Police Department responded to the ABUGHANEM residence and were

told by a family member who answered the door that "Victim 1 is fine". Fiancé 1 and the Lackawanna Police Department were unaware that Victim 1 had already been taken to Sanaa, Yemen. Lackawanna Police reported that after this call, a lawyer who allegedly represents the ABUGHANEM family requested that they stop making welfare checks.

31. According to Victim 1, from on or about October 22, 2021, until March 2022, Victim 1 was held against her will in the apartment in Sanaa, Yemen under the supervision of KHALED ABUGHANEM. During this time, Victim 1 stated that:

- a. KHALED ABUGHANEM threatened to kill Victim 1 multiple times; and
- b. KHALED ABUGHANEM made it clear that he brought Victim 1 to Yemen so that, if she did not comply with his orders, he could commit an honor killing against her without being held accountable by American authorities.

32. In approximately March of 2022, KHALED ABUGHANEM departed Yemen to travel to the United Arab Emirates (UAE) to obtain visas for the ABUGHANEM family, except for Victim 1. Victim 1 stated while talking on the phone about why she did not get a visa, KHALED ABUGHANEM told her, "I should've killed you before I left Yemen, you bitch, my biggest mistake was to keep you alive." Victim 1 also stated that KHALED ABUGHANEM told her that he had the money for a third party to kill her and that the American government could not stop him.

33. In approximately April 2022, Victim 1's mother and other members of Victim 1's family departed Yemen for the UAE, leaving Victim 1 in the supervision of [REDACTED]

██████████ Victim 1 remained restricted to the apartment, without contact with the outside world.

34. In approximately June 2022, WALEED ABUGHANEM arrived in Sanaa, Yemen and assisted in keeping Victim 1 restricted to the apartment. In approximately September of 2022, ██████████ departed Yemen for the UAE, leaving WALEED ABUGHANEM responsible for keeping Victim 1 in Yemen and restricted her from contacting anyone.

35. On or about November 15, 2022, Victim 1 learned from her family that they did not intend to bring her back to the U.S. According to Victim 1, KHALED ABUGHANEM and WALEED ABUGHNAEM want her to marry in Yemen and remain in Yemen. According to Victim 1, KHALED ABUGHANEM wants Victim 1 to remain in Yemen where he believes that he can have her killed without any repercussions from U.S. law enforcement.

36. On or about December 17, 2022, WALEED ABUGHANEM departed Sanaa, Yemen, leaving Victim 1 in the custody of his spouse. Upon arrival into the U.S. Port of Entry at Boston, MA, WALEED ABUGHANEM was referred to secondary inspection by CBP.

37. During the CBP inspection, a border search of WALEED ABUGHANEM's electronic device(s) was conducted by CBP. This examination revealed a text message



conversation in a Yemeni dialect of Arabic between WALEED ABUGHANEM (based upon investigation, whose phone number I know to be 716-xxx-5605) and KHALED ABUGHANEM (based upon investigation, whose phone number I know to be 716-xxx-6111) from on or about December 8, 2022, through on or about December 12, 2022, discussing Victim 1. Parts of that conversation that appear to pertain to Victim 1 were translated into English by an FBI linguist. A portion of the translation is shown in Exhibit A, which is attached to this affidavit and incorporated by reference herein. Relevant portions of the conversation revealed the following:

- a. WALEED ABUGHANEM texted that “I’d say, keep her here until she knows what is right,” and that “obedience to you [i.e., KHALED ABUGHANEM] is obedience to God, everyone else go to hell”;
- b. KHALED ABUGHAEM texted that, “I do not want her to come back with you and then run away”;
- c. KHALED ABUGHANEM instructed WALEED ABUGHANEM to talk to Victim 1: “Alone, talk to her and if you find her to be sincere, tell her fine, I will vouch for you with my dad (meaning KHALED ABUGHANEM) on the promise that you would not make the mistake again, and you would listen and carry out anything they ask of you, and see what her response will be. In writing”;
- d. KHALED ABUGHANEM texted that, “I would never vouch for her, if she runs away again, she would never come back”;
- e. KHALED further texted instructions to WALEED: “Ok, just test the waters, and be astute. This would bring shame to you, you know. We would not be

able to restrict her in the U.S., she disregards the moral values, the customs, the traditions, her brothers, her father, her family; she discarded all that and just left. You see?";

- f. WALEED texted KHALED that he spoke with Victim 1 and that "I agreed with her that she would finish her studies and we (meaning WALEED ABUGHANEM and KHALED ABUGHANEM) marry her off, so she would settle down";
- g. WALEED texted, "I will take care of everything and father, I am at your command. Ask and I will do";
- h. WALEED further texted "I swear to God, I am with you. That's it! I will travel alone. Whatever you say! We are at your command. She will stay here until she realizes what is right. Even if that means she stays (here) her whole life. If she does not straighten up, she should be killed, and no one would say anything. All right! That's what will happen"; and
- i. KHALED ABUGHANEM texted in response, "Waleed, you are responsible for her." KHALED further texted WALEED that "I don't trust her at all, but I think you are right, and you can take responsibility of your sister, and if she is in your hand, then go ahead. There will be no studies, she must get married, and if she wants to finish her studies, she can do that while with her husband. She is no longer my daughter. After what she did, she has no rights. Once she enters the U.S., you won't be able to do anything to her".

38. This examination also revealed a text message conversation in a Yemeni dialect of Arabic between WALEED ABUGHANEM (based upon investigation, I know to be using the phone number 716-xxx-5605) and [REDACTED] (based upon investigation, whose phone number I believe to be [REDACTED]) from on or about December 11, 2022, through on or about December 12, 2022, discussing Victim 1.<sup>2</sup> Parts of that conversation that appear to pertain to Victim 1 were translated into English by an FBI linguist. A portion of the translation is attached as Exhibit B, which is attached to this affidavit and incorporated by reference herein.<sup>3</sup> Relevant portions of the conversation revealed the following:

- a. WALEED ABUGHANEM texted [REDACTED], "What is your decision with regards to your sister? The most suitable...";
- b. [REDACTED] responded and texted that, "She stays there and get married while with you. If she wants to get out with her husband, it should be

<sup>2</sup> I have been unable to verify that this phone number belongs to [REDACTED]. However, Victim 1 identified the current locations of her family members and noted that her brother [REDACTED] was living in the United Arab Emirates, while Waleed ABUGHANEM was living with her in Yemen. I also know that Khaled ABUGHANEM maintains the phone number 716-6111. Thus, the only one of Victim 1's adult brothers who was outside of the United States during this time period was [REDACTED]. Further, the phone number that I believe to be [REDACTED] is from a WhatsApp group chat, which I believe, based on the description of events, to contain messages from [REDACTED] WALEED, and KHALED ABUGHANEM. Additionally, one of the last text messages sent to WALEED ABUGHANEM is an instruction to delete the group and the saved messages, potentially explaining why the contact is not in WALEED ABUGHANEM's contact list. Finally, a conversation described in footnote five refers to "three minds" being "better than one." Based on this; the content of the conversations described in Exhibits B and C; and the information described in footnote 5, I submit that there is probable cause to believe that phone number described in paragraph 40 belongs to [REDACTED].

<sup>3</sup> Given its volume, the translation of this entire text conversation is not yet complete. The linguist assisting with this investigation was asked to first translate communications that appeared to refer to Victim 1.



in five years. Type to me. We don't want her to hear. We've had enough. Two things are unreliable: Breaks and women.";

c. [REDACTED] further texted WALEED, "This is what I think: 1. She stays with you and get married. 2. She stays with you and get married to someone from the Emirates...3. No [coming back to] America. All this should happen in 2023."; and

d. [REDACTED] texted WALEED that, "OK. Close this subject and keep an eye on the document in the safe, the net, and the phones.<sup>4</sup> If she was willing to go to Mexico, it means she is not that simple. Be careful. Yemeni women are naïve. They are stupid, don't let her play them. If she tried to discuss the travelling matter, end the discussion. Go ahead. Delete the group and the saved conversations. No Wi-Fi in your apartment.. In the guest room only."

39. Additionally, this examination revealed a portion of text message conversation in a Yemani dialect of Arabic between WALEED ABUGHANEM (716-xx-5605) and [REDACTED] (whose phone number I believe to be [REDACTED] from on or about September 2, 2021, through on or about September 24, 2021, discussing Victim 1.<sup>5</sup>

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<sup>4</sup> Based on my investigation, I believe that "the document" refers to Victim 1's U.S. Passport.

<sup>5</sup> I have been unable to verify that this phone number belongs to [REDACTED]. However, travel records show that the only adult members of the ABUGHANEM family who went to Mexico in or around September 2014 were KHALED ABUGHANEM, who has maintained the phone number 716-xxx-6111; KHALED ABUGHANEM's wife, whose phone number was not found in this text conversation; and [REDACTED]. Additionally, "[REDACTED]" is listed in Waleed ABUGHANEM's contacts under [REDACTED], and "[REDACTED]" under the phone number [REDACTED]. Because these appear to be the same phone numbers, I believe that this shows that Waleed ABUGHANEM identifies [REDACTED] as "[REDACTED]" in his phone. The [REDACTED] number described in paragraph 40 appears in old text records as "[REDACTED]" but the number is not in WALEED ABUGHANEM's address book. Finally, one of the incoming messages in Exhibit

Parts of that conversation that appear to pertain to Victim 1 were translated into English by an FBI linguist. The translation is attached as Exhibit C, which is attached to this affidavit and incorporated by reference herein. Relevant portions of the conversation, which were sent during the time of the events in Mexico described above, revealed the following:

- a. WALEED ABUGHANEM texted [REDACTED], "What did you do with the whore?";
- b. [REDACTED] responded and texted, "The first part of the plan worked.";
- c. WALEED ABUGHANEM texted, "which is? She stays with you. Or she travels to Egypt.";
- d. [REDACTED] texted, "We took the woman to the hotel at her consent. And don't tell anyone. Not Ghadir or anyone and delete the messages when we get her in the U.S.";
- e. WALEED ABUGHANEM texted [REDACTED] that, "The most important thing is have the girl return with you.";
- f. [REDACTED] responded and texted, "We have the woman with us..but her belongings are in their house. We will give it to them tomorrow. Don't you worry. The first plan worked out. It was all with her consent. We need the documents, and we need to enter the U.S. and you take it from there.";

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C states, "OK. We will go to dad tomorrow. We will see what he thinks. Three minds is better than one." Based on this, as well as the content of the conversations, I submit that there is probable cause to believe that this phone number was used by [REDACTED]

- g. WALEED ABUGHANEM responded and texted, "The most important thing is: Do not tell her about marrying another man. I mean about another man. She will get suspicious. Tell your mom not to tell her.";
- h. [REDACTED] responded and texted, "There are three plans.";
- i. WALEED ABUGHANEM responded and texted, "Have her come here and don't you worry. Leave it to me. Be careful, she could leave when you are sleeping. The most important thing is: Don't let her sit with the guy or contact him by phone or messages. Tell dad not to raise his voice or talk to much. Keep things cool. So that she will feel safe and do what you want her to do.";<sup>6</sup>
- j. [REDACTED] texted on or about September 11, 2021, that "We are at the airport.";
- k. [REDACTED] texted on or about September 14, 2021: "Make sure the back door is closed. And stay up late at the living room. So she doesn't get out. If you are going to sleep, send me a message so I can check the two areas. I have another plan. Tell me what you think. I can go to Egypt ahead of her. I should go by myself to prepare things, like the apartment and what not. This will give us some extra time with her, we will do whatever she wants. Meanwhile, your father finishes his work, and the passports would be ready by then. We will have time to resolve the house matter. Once your father goes there, he will take them and travel to Egypt. – So who will come with us in the beginning?";

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<sup>6</sup> Based on my investigation, your affiant believes this part of the conversation refers to the second restaurant meeting between the ABUGHANEM family and Fiancé 1's family in Mexico as described above.

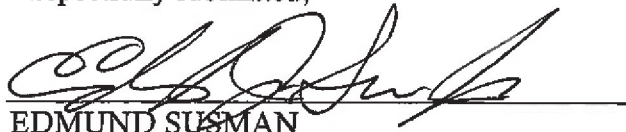


- l. WALEED ABUGHANEM texted, "You, the woman, my mother, the kids, and I. When she sees that we are all with her, she'd think it's for the wedding.";
- m. [REDACTED] texted, "But you should not trust a young woman. No matter who. We have to install a camera or have your mother and the kids stay.";
- n. WALEED ABUGHANEM texted, "Before we leave we will install cameras, so that we can see everything.";
- o. [REDACTED] texted, "Is that good? Osama can stay with Ghadeer and her daughter, and we.";
- p. WALEED ABUGHANEM texted, "I will install the cameras tomorrow.";
- q. [REDACTED] texted, "Okay. Now we to strategize how to make the next move. With consent. Sound and image! And connect it to the internet so that we can check from our phones."; and
- r. WALEED ABUGHANEM texted, "Your mother wants to mess up everything. She wants to tell [Victim 1] if we marry her off, would she agree. She will ruin everything."

**WHEREFORE**, based upon the foregoing, your affiant submits there is probable cause to believe that KHALED ABUGHANEM, WALEED ABUGHANEM, and [REDACTED] have violated Title 18, United States Code, Section 956(a)(1) ((Conspiracy to Kidnap Persons in a Foreign Country). I respectfully request that the Court issue the attached Criminal Complaint and arrest warrants for KHALED ABUGHANEM, WALEED ABUGHANEM, and [REDACTED]. I further request that the Court seal the

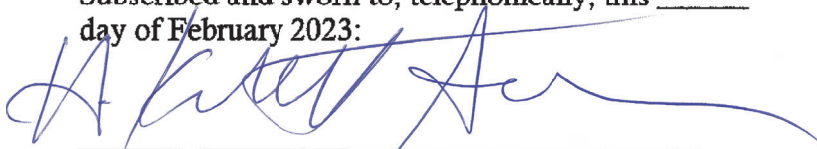
requested Criminal Complaint, this affidavit, and the requested warrants until such time as the warrants are effectuated.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Edmund Susman', written over a horizontal line.

EDMUND SUSMAN  
TASK FORCE OFFICER  
FEDERAL BUREAU OF INVESTIGATION

Subscribed and sworn to, telephonically, this 13th  
day of February 2023:

A handwritten signature in blue ink, appearing to read 'H. Kenneth Schroeder', written over a horizontal line.

HONORABLE H. KENNETH SCHROEDER  
UNITED STATES MAGISTRATE JUDGE

# **EXHIBIT A**



2022-12-08T23:46:45.199Z	OUT	طيب بكلمها وشوف كيف اسلوب كلامها وكلمك [] OK, I will talk to her and assess her manners in speaking, and then will let you know.	BIG BOSS
2022-12-08T23:47:01.736Z	OUT	ان شفتها صادقته بقلك If I find her to be honest, I will let you know	BIG BOSS
2022-12-08T23:48:15.952Z	OUT	بكلامها انها مارح تفعل اي شي غلط وقيس نبضها انها صادقته او بتكذب [I will see] if she [promises] she would not do anything wrong . . . will assess whether she is sincere or lying.	BIG BOSS
2022-12-08T23:48:40.294Z	OUT	وانا كذلك متخوف لجيت لصدق [] To be honest with you. I am worried as well.	BIG BOSS
2022-12-08T23:50:02.541Z	OUT	اخذتها من لساني انا خايف من هذا الشي [] I am telling you. I am worried as well	BIG BOSS
2022-12-08T23:51:14.708Z	OUT	لو جيت لصدق خليها هنا لما تعرف ان الله حق وتعرف انها على غلط I'd say, keep her here until she knows what is wright ... and that What she is doing is wrong	BIG BOSS
2022-12-08T23:52:20.682Z	OUT	شوف اذا جبتها معي راح اكلمك من الان مارح اكون المساول على اي شي تفعله هي Look, if I bring her with me . . . I am telling you. I will not be responsible for anything she does.	BIG BOSS
2022-12-08T23:52:52.066Z	OUT	اكيد [] Absolutely.	BIG BOSS
2022-12-08T23:52:58.297Z	OUT	ولا يهمك Don't you worry!	BIG BOSS
2022-12-08T23:53:10.27Z	OUT	الخبر كله بيوصلك بكره You will know everything by tomorrow.	BIG BOSS
2022-12-08T23:54:22.762Z	OUT	سهل اهم شي طاعتكم من طاعت رب العالمين وطز في الباقيين [] Easy. Obedience to you is obedience to God. Everyone else go to Hell.	BIG BOSS

2022-12-08T23:55:55.836Z	OUT	الجميع في امان الرحمان Everyone is in God's protection.	BIG BOSS 🐶
2022-12-09T04:34:17Z	IN	متي انت جاي ؟ When are you coming?	BIG BOSS 🐶
2022-12-09T04:35:13Z	IN	كيف شفت البننت ؟ How did you find her?	BIG BOSS 🐶
2022-12-09T04:35:23Z	IN	تأديت Is she behaving?	BIG BOSS 🐶
2022-12-09T04:36:12Z	IN	كيف تغيرت Has she changed?	BIG BOSS 🐶
2022-12-09T04:36:28Z	IN	مش ترجع معك وبعدھا تهرب [I] do not [want her] to come with you and then run away.	BIG BOSS 🐶
2022-12-09T04:38:41Z	IN	ادهم مش راجع امريكا مطول [REDACTED] is not coming back to the US. It would be a while until he comes back.	BIG BOSS 🐶
2022-12-09T04:39:17Z	IN	ايش الضمان What are the guarantees?	BIG BOSS 🐶
2022-12-09T04:39:37Z	IN	متي انت راجع When are you coming back?	BIG BOSS 🐶
2022-12-09T04:40:07Z	IN	ايش من يوم What day?	BIG BOSS 🐶
2022-12-09T04:40:45Z	IN	اكنت الحجز Have you confirmed the reservation?	BIG BOSS 🐶
2022-12-09T04:42:10Z	IN	البننت كلمتاك Has she talked to you?	BIG BOSS 🐶

2022-12-09T04:42:57Z	IN	<p>كلمتها انت وقلت لها ايش الضمان انها ما تفعل الشئ الغلط مره ثانية</p> <p>Have you talked to her and asked her what would be the guarantees?</p>	BIG BOSS
2022-12-09T04:45:44Z	IN	<p>وحدها كلمها وشوف واذا شفت انها صادقه قلها خلاص انا بظمن عlish عند ابي انش معد تغلطي مره اخري وانش تسمعي الكلام وتنفيدي كل شي بطلبو منش !</p> <p>وشوف ايش الرد</p> <p>Alone . . . talk to her and if you find her to be sincere, tell her: fine, I will vouch for you with my dad on the promise that you would not make the same mistake again, and you would listen and carry out anything that they ask of you . . . and see what her response would be.</p>	BIG BOSS
2022-12-09T04:45:58Z	IN	<p>استعمل الكتابه</p> <p>In writing.</p>	BIG BOSS
2022-12-09T04:47:18Z	IN	<p>صادقه بايش ؟</p> <p>Sincere in what?</p>	BIG BOSS
2022-12-09T04:48:00Z	IN	<p>انا بصراحة معد اضمنها ابدأ</p> <p>I would never vouch for her.</p>	BIG BOSS
2022-12-09T04:49:35Z	IN	<p>اذا هربت مره اخري فلن ترجع ابدأ ... تعرف ذلك !!</p> <p>If she runs away again, she would never come back.</p>	BIG BOSS
2022-12-09T04:52:15Z	IN	<p>خلاص</p> <p>قيس النبض وخلق نكي</p> <p>هذا هي عاركم</p> <p>فهمت .</p> <p>في امريكا ما عد نقدر نضبطها.. لأن الوازع الاخلاقي والعادات والتقاليد الاجتماعية واخوانها وابوها واهلها جميعا ضربت به عرض الحائط وراحت !!! فهمت</p> <p>OK, just test the waters, and be astute. This would bring shame to you, you know. We would not be able to restrict her in the US; she disregarded the moral values, the customs, the traditions, her brothers, her father, her family; she discarded all that and just left. You see?</p>	BIG BOSS



2022-12-09T04:53:21Z	IN	ومن متي انت مسؤول عن اي شي !!! اذا قدك مسؤول علي نفسك ف الف شكر Additionally, when have you ever been responsible for anything? I would have been grateful if you were responsible for your own self.	BIG BOSS
2022-12-09T04:53:49Z	IN	ان شاء الله God willing.	BIG BOSS
2022-12-09T04:55:05Z	IN	ربنا يوفقك ويسعدك May God bless you and give you happiness.	BIG BOSS
2022-12-09T04:55:13Z	IN	[/private/var/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Message/Media/17167176111@s.whatsapp.net/a/b/]	BIG BOSS
2022-12-10T20:41:16.206Z	OUT	[/private/var/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Message/Media/17167176111@s.whatsapp.net/1/1/]	BIG BOSS
2022-12-10T20:42:21.453Z	OUT	[/private/var/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Message/Media/17167176111@s.whatsapp.net/7/2/]	BIG BOSS
2022-12-10T20:42:36.892Z	OUT	[/private/var/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Message/Media/17167176111@s.whatsapp.net/a/7/]	BIG BOSS
2022-12-11T19:03:46.336Z	OUT	[/private/var/mobile/Containers/Shared/AppGroup/group.net.whatsapp.WhatsApp.shared/Message/Media/17167176111@s.whatsapp.net/7/f/]	BIG BOSS
2022-12-11T19:03:58.13Z	OUT	هذولا التذاكر These are the tickets.	BIG BOSS
2022-12-11T19:04:46.872Z	OUT	انا غيرت موعد تذكري عشان البننت نخطا سوا I changed my reservation, so she and I come together.	BIG BOSS
2022-12-11T19:05:33.539Z	OUT	راح نتوكل من اليمن تريخ 16 We will leave Yemen on the 16 <sup>th</sup>	BIG BOSS
2022-12-11T19:05:58.097Z	OUT	ومن عمان تريخ 17 And will leave Oman [or Amman] on the 17 <sup>th</sup>	BIG BOSS

2022-12-11T19:06:05.164Z	OUT	الى امريكا To the US.	BIG BOSS
2022-12-11T19:06:29.982Z	OUT	ارسل لنا حق التذكرة حق شيماء Send us [REDACTED]'s ticket.	BIG BOSS
2022-12-11T19:07:16.16Z	OUT	بكره نعطيه الفلوس We will give him the money tomorrow.	BIG BOSS
2022-12-11T19:07:36.438Z	OUT	\$1800 \$1800	BIG BOSS
2022-12-11T19:13:07.668Z	OUT	ايوه على ضمانتي Yes, I guarantee that.	BIG BOSS
2022-12-11T19:13:20.849Z	OUT	ولا تخاف من هذي الناحيه Don't you worry about that!	BIG BOSS
2022-12-11T19:13:38.897Z	OUT	انشاء الله God willing	BIG BOSS
2022-12-11T19:15:44.741Z	OUT	كل سوال في بالك سالتها وشفنت اسلوبها في الرد والبنيت نادمه وناسيه لكل شي صار ومتاسفه وعرفت انيه على غلط I asked her about everything you can think of, and I assessed her responses. The woman is remorseful and sorry for everything she did . . . and she admits that she made a mistake.	BIG BOSS
2022-12-11T19:17:11.875Z	OUT	يا ابو وليد هذا عاري واختي مارج اسمح لاحد يخذشه حنا خدش لو طارت رقبتني Abu-Walid, that would bring shame to me . . . she is my sister. and I would not allow anyone to undermine our honor . . . that would be over my dead body.	BIG BOSS
2022-12-11T19:17:39.381Z	OUT	كنت عارف انك راح تقول لي هكذا I knew you would say that.	BIG BOSS
2022-12-11T19:17:51.771Z	OUT	بس نطمئن But rest assured	BIG BOSS

2022-12-11T19:18:09.911Z	OUT	انا عارف I know	BIG BOSS
2022-12-11T19:18:35.432Z	OUT	ما فيش العن مني مع تفاهم معا النساء No one is better than I am in dealing with women.	BIG BOSS
2022-12-11T19:19:12.845Z	OUT	انا ضامن البنت ولو صار شي لا قدر الله انا المساول I vouch for her, and if anything were to happen, God forbid, I would be the one to blame.	BIG BOSS
2022-12-11T19:21:44.065Z	OUT	اتفقت معها على هذا الشي تكمل دراستها ونجوزها وتستقر I agreed with her that she would finish her studies and we marry her off, so she would settle down.	BIG BOSS
2022-12-11T19:22:57.298Z	OUT	وانشاء الله ما يصير الى كل شي طيب باذن الله وتشوف احفادك من بنتك الذي راح ترفع راسك باذن الله God willing, only good things will happen. You will come to see her children . . . she will make you proud, God willing.	BIG BOSS
2022-12-11T19:23:17.658Z	OUT	مارح نخلف We will not disagree on this.	BIG BOSS
2022-12-11T19:23:39.032Z	OUT	مارح يصير الى الذي يرضي الله ثما يرضيكم I promise, only that which pleases you and God will happen.	BIG BOSS
2022-12-11T19:25:17.599Z	OUT	ابي الغالي تدخل البنت وبعدين ولا يهملك My beloved father, [let] the woman enter [the country] and leave the rest [on me] [TN: This could also mean, "once the woman gets married, leave the rest on me".]	BIG BOSS
2022-12-11T19:25:57.321Z	OUT	انا راح اتكلف بكل شي والمساول I will take care of everything.	BIG BOSS
2022-12-11T19:27:32.282Z	OUT	ابيه نعم ونص اهم شي الذي طلبوها ناس و عيال اصول ومن حق البنت تشوفه وما عليك من الباقي انا المساول I	BIG BOSS



		Yes for sure... and the most important thing is ... those who ask for her [hand] are of good families . . . and it would be her right to see him [her potential husband] and leave the rest on me. Don't you worry!		
2022-12-11T19:31:40:285Z	OUT	الآن يا ابي العزيز انت امرني ونا راح اسويه Father, I am at your command. Ask and I will do.	BIG BOSS	
2022-12-11T19:36:27:593Z	OUT	اسمعي يا ابو وليد والله ثم والله اني معاك وخلاص راح اسافر لوحدي وكلامك راح يستمع وفوق راوسنا والبنيت راح تجلس هنا لما تعرف ان الله حق Listen, abu-Walid, I swear to God, I am with you. That's it! I will travel alone. Whatever you say! We are at your command. She will stay here until she realizes what is right.	BIG BOSS	
2022-12-11T19:38:07:99Z	OUT	لو تجلس طول عمرها وهذا الذي راح يصير واذا لم تتعدل تنقفل ومحد راح يقول شي Even if that means she stays [here] her whole life. If she does not straighten up, she should be killed, and no one would say anything.	BIG BOSS	
2022-12-11T19:40:58:461Z	OUT	خلاص راح يتم هذا الخبر وانشاء الله يصير الله كتبه الله لها بالخير All right! That's what will happen. God willing she is fated for good things.	BIG BOSS	
2022-12-12T00:12:35Z	IN	البنيت على ضمانتك يا وليد ؟ Walid, you are responsible for her.	BIG BOSS	
2022-12-12T00:12:54Z	IN	هل بتسمع لنا Do you hear me?	BIG BOSS	
2022-12-12T00:13:24Z	IN	وتنفذ اذا جا نصيبها بشخص كويس Carry out [the plan] if a good man shows up.	BIG BOSS	
2022-12-12T00:14:14Z	IN	كيف حكمت عليها ؟ فحسنتها وقست البنض ؟ How did you find her? Did you test the waters?	BIG BOSS	
2022-12-12T00:16:35Z	IN	مدري وهي بتضحك عليك ؟ البنيت ملعونه I don't know. She might be fooling you.	BIG BOSS	
2022-12-12T00:16:50Z	IN	وانت علي نيائك And you are too kind.	BIG BOSS	

2022-12-12T00:17:38Z	IN	تمام فاهم Okay ... understood.	BIG BOSS
2022-12-12T00:18:02Z	IN	الخوف من البنت مش من الناس! I am worried about her, not people	BIG BOSS
2022-12-12T00:20:39Z	IN	انا مش ضامننها ايدا . لكن اذا انت شفت انك علي صح وانك بتتحمل مسؤولية اخذك وانها في يدك ... وتسمع الكلام و تزوجها ..... فعلى بركة الله I don't trust her at all ... but if you think you are right, and you can take responsibility of your sister ... and if she is in your hand, then go ahead.	BIG BOSS
2022-12-12T00:22:27Z	IN	ما بش دراسة. زواجه وبعدين اذا تشتي نكمل عند زوجها There will be no studies'. She must get married, and if she wants to finish her studies', she can do that while with her husband	BIG BOSS
2022-12-12T00:22:54Z	IN	تكمل دراستها بعد الزواجه She finishes her studies after she gets married	BIG BOSS
2022-12-12T00:23:08Z	IN	تفهم هذا الشيء Understand!	BIG BOSS
2022-12-12T00:23:28Z	IN	ما عد هي بنتي She is no longer my daughter.	BIG BOSS
2022-12-12T00:24:30Z	IN	في ناس طلبوها ... الان هل بتدخل تتزوج ؟ A family asked for her hand.	BIG BOSS
2022-12-12T00:25:37Z	IN	اذا خلها عندك So keep her with you.	BIG BOSS
2022-12-12T00:26:06Z	IN	طلبوها ناس هنا في امريكا هل تدخل تتزوج A family asked for her hand. Here in the US; would she get married?	BIG BOSS

2022-12-12T00:26:16Z	IN	نعم او لا Yes or no?	BIG BOSS
2022-12-12T00:30:26Z	IN	ما عد لها اي حق في شي بعد الذي عملته يا وليد ... راحت الي اخر المكسيك حدود الاكوادور ...!!!!!!! في اخطر بقاع الارض في القاره الجنوبيه !!! انت مش مقرر ايش فعلت الكلبه Walid, after what she did, she has no rights. She went to the end of Mexico, to the Ecuadorian borders.	BIG BOSS
2022-12-12T00:33:14Z	IN	انا سافرت اكثر مناطق العالم .. والله ثم والله اني اخاف السفر الي هذه المناطق لانها خطره وحياه الشخص ب ربع دولار .... ايش بك I traveled around the world ... I swear to God, I fear going to these places for how dangerous they are ... human lives worth nothing there. What is wrong with you?	BIG BOSS
2022-12-12T00:34:41Z	IN	البننت غداره!!! She is insidious!	BIG BOSS
2022-12-12T00:35:59Z	IN	اذا دخلت والله ما عد تقدر تفعل لها شي.. ويتمشي الذي في راسها Once she enters [the US], you won't be able to do anything to her. She will do whatever she wants!	BIG BOSS
2022-12-12T00:41:47Z	UNK NOW N		BIG BOSS
2022-12-12T00:41:55Z	IN	اووو Ohhh	BIG BOSS
2022-12-12T00:42:28Z	IN	الان انتم اخوتها You are her brothers ...	BIG BOSS



## **EXHIBIT B**



# **EXHIBIT C**



2021-09-09T05:22:37.877Z	⚡ OUTGOING	م	أعز شي لا تخاف ما تخاف مع والدك ولا تتواصل معه بظنون أو رسائل	The most important thing is Don't let her all with the guy or contact him by phone or messages
2021-09-09T05:22:37.877Z	⚡ OUTGOING	M	أعز شي لا تخاف ما تخاف مع والدك ولا تتواصل معه بظنون أو رسائل	As they say Keep your where close and you will be at peace
2021-09-09T05:22:42.811Z	⚡ INCOMING	M	يقول الملك خلي قهيقك تحت راسك لفرانج	Tell dad not to raise his voice or talk too much Keep things cool
2021-09-09T05:22:42.811Z	⚡ INCOMING	M	يقول الملك خلي قهيقك تحت راسك لفرانج	So that she will feel safe and do what you want her to do
2021-09-09T05:24:01.875Z	⚡ OUTGOING	M	خلي ابي لا يطلع مسرعه ولا يهورر خلي الامور عليه	We arrived at the airport
2021-09-09T05:24:01.875Z	⚡ OUTGOING	M	خلي ابي لا يطلع مسرعه ولا يهورر خلي الامور عليه	Now?
2021-09-09T05:24:23.864Z	⚡ OUTGOING	M	بخان البيت تلمن وتشمي على ماقشو	Yes
2021-09-09T05:24:23.864Z	⚡ OUTGOING	M	بخان البيت تلمن وتشمي على ماقشو	We told you at 11
2021-09-11T03:02:35.868Z	⚡ INCOMING	M	والد وصلنا المطار	I am with you
2021-09-11T03:02:35.868Z	⚡ INCOMING	M	والد وصلنا المطار	How is your mother?
2021-09-11T03:02:58.007Z	⚡ OUTGOING	M	والد وصلنا المطار	Okay well
2021-09-11T03:02:58.007Z	⚡ OUTGOING	M	والد وصلنا المطار	We are still on the airplane
2021-09-11T03:03:03.038Z	⚡ INCOMING	M	والد وصلنا المطار	Your mother [M]
2021-09-11T03:03:03.038Z	⚡ INCOMING	M	والد وصلنا المطار	Where are you?
2021-09-11T03:03:10.242Z	⚡ INCOMING	M	والد وصلنا المطار	Get me one vape
2021-09-11T03:03:22.372Z	⚡ INCOMING	M	والد وصلنا المطار	Read bail
2021-09-11T03:03:22.372Z	⚡ INCOMING	M	والد وصلنا المطار	It's called [look up emoji]
2021-09-11T03:03:24.588Z	⚡ OUTGOING	M	والد وصلنا المطار	Where is the key?
2021-09-11T03:03:30.968Z	⚡ OUTGOING	M	والد وصلنا المطار	with me
2021-09-11T03:03:30.968Z	⚡ OUTGOING	M	والد وصلنا المطار	When I come back
2021-09-11T03:03:39.282Z	⚡ INCOMING	M	والد وصلنا المطار	I will bring it to you
2021-09-11T03:03:52.501Z	⚡ INCOMING	M	والد وصلنا المطار	OK, quickly
2021-09-11T03:03:52.501Z	⚡ INCOMING	M	والد وصلنا المطار	Why?
2021-09-11T03:04:11.338Z	⚡ OUTGOING	M	والد وصلنا المطار	Why I got out
2021-09-11T03:04:11.338Z	⚡ OUTGOING	M	والد وصلنا المطار	?
2021-09-11T03:18:58.89Z	⚡ OUTGOING	M	والد وصلنا المطار	I feel like you are going to New York
2021-09-11T03:18:58.89Z	⚡ OUTGOING	M	والد وصلنا المطار	Why don't you talk? Move
2021-09-11T03:18:58.89Z	⚡ OUTGOING	M	والد وصلنا المطار	what is [redacted]s number
2021-09-12T00:49:28.861Z	⚡ INCOMING	M	والد وصلنا المطار	Make sure the back door is closed. And stay up late at the living room.
2021-09-12T00:49:28.861Z	⚡ INCOMING	M	والد وصلنا المطار	So she doesn't get out
2021-09-12T00:49:45.942Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-12T00:49:53.082Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-12T00:50:10.581Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-12T00:50:10.581Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-12T11:28:46.021Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-12T11:28:46.021Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-12T11:28:07.483Z	⚡ OUTGOING	M	والد وصلنا المطار	
2021-09-12T11:28:07.483Z	⚡ OUTGOING	M	والد وصلنا المطار	
2021-09-12T11:29:14.004Z	⚡ OUTGOING	M	والد وصلنا المطار	
2021-09-12T11:29:14.004Z	⚡ OUTGOING	M	والد وصلنا المطار	
2021-09-12T11:29:20.283Z	⚡ OUTGOING	M	والد وصلنا المطار	
2021-09-12T11:29:20.283Z	⚡ OUTGOING	M	والد وصلنا المطار	
2021-09-12T11:29:34.334Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-12T11:29:34.334Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-12T11:29:45.419Z	⚡ OUTGOING	M	والد وصلنا المطار	
2021-09-12T11:29:45.419Z	⚡ OUTGOING	M	والد وصلنا المطار	
2021-09-12T11:29:56.225Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-12T11:29:56.225Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-12T12:27:10.495Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-12T12:27:10.495Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-12T12:38:56.381Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-12T12:38:56.381Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-12T12:38:56.381Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-12T12:43:57.507Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-12T12:43:57.507Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-14T01:05:38.356Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-14T01:05:38.356Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-14T01:07:19.431Z	⚡ OUTGOING	M	والد وصلنا المطار	
2021-09-14T01:07:19.431Z	⚡ OUTGOING	M	والد وصلنا المطار	
2021-09-15T08:59:40.589Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-15T08:59:40.589Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-15T08:59:51.81Z	⚡ INCOMING	M	والد وصلنا المطار	
2021-09-15T08:59:51.81Z	⚡ INCOMING	M	والد وصلنا المطار	



And [before] he comes with [redacted] and her daughter

[illegible]

M أرحمني أسير الأمور إن شقة وغيرة . هذا بؤسنا وقت مع البيت . إن الحاد يسوي الذي تنقي في حال الوقت هذا أوله قد كل عمله . الجوزات قد  
 M أرحمني أسير الأمور إن شقة وغيرة . هذا بؤسنا وقت مع البيت . إن الحاد يسوي الذي تنقي في حال الوقت هذا أوله قد كل عمله . الجوزات قد  
 M وما اللية البيت سيهل كله بيرة من هنا  
 M لو هكذا اجلسوا هنا شهر وخاطر جسمه  
 M لو هكذا اجلسوا هنا شهر وخاطر جسمه  
 M مساليت البيت هناك سيهل  
 M مساليت البيت هناك سيهل  
 M البيت يتعسر إن هي شيف إن لا قد ميقت على شان أسير كل شي . يتعسر  
 M البيت يتعسر إن هي شيف إن لا قد ميقت على شان أسير كل شي . يتعسر  
 M البيت يتعسر إن هي شيف إن لا قد ميقت على شان أسير كل شي . يتعسر  
 M البيت يتعسر إن هي شيف إن لا قد ميقت على شان أسير كل شي . يتعسر

2021-08-15T09:10:51.22Z	FINCOMING
2021-08-15T08:16:51.22Z	FINCOMING
2021-08-15T08:11:50.848Z	FINCOMING
2021-08-15T08:11:50.848Z	FINCOMING
2021-08-15T08:12:07.179Z	FINCOMING
2021-08-15T08:12:07.179Z	FINCOMING
2021-08-15T08:12:20.28Z	FINCOMING
2021-08-15T08:12:20.28Z	FINCOMING
2021-08-15T08:12:25.145Z	FINCOMING
2021-08-15T08:12:25.145Z	FINCOMING
2021-08-15T08:12:25.43Z	FINCOMING
2021-08-15T08:12:25.43Z	FINCOMING
2021-08-15T08:12:41.776Z	FINCOMING
2021-08-15T08:12:41.776Z	FINCOMING
2021-08-15T08:12:52.411Z	FINCOMING
2021-08-15T08:12:52.411Z	FINCOMING
2021-08-15T08:12:55.421Z	FINCOMING
2021-08-15T08:12:55.421Z	FINCOMING
2021-08-15T08:13:08.48Z	FINCOMING
2021-08-15T08:13:08.48Z	FINCOMING
2021-08-15T08:13:24.88Z	FINCOMING
2021-08-15T08:13:24.88Z	FINCOMING
2021-08-15T08:14:02.819Z	FINCOMING
2021-08-15T08:14:02.819Z	FINCOMING
2021-08-15T08:14:41.831Z	FINCOMING
2021-08-15T08:14:51.34Z	FINCOMING
2021-08-15T08:14:51.34Z	FINCOMING
2021-08-15T08:16:00.88Z	FINCOMING
2021-08-15T08:16:00.88Z	FINCOMING
2021-08-15T08:16:00.88Z	FINCOMING
2021-08-15T08:17:43.887Z	FINCOMING
2021-08-15T08:17:43.887Z	FINCOMING
2021-08-15T08:18:28.52Z	FINCOMING
2021-08-15T08:18:28.52Z	FINCOMING
2021-08-15T08:19:32.265Z	FINCOMING
2021-08-15T08:19:32.265Z	FINCOMING
2021-08-15T08:19:41.135Z	FINCOMING
2021-08-15T08:19:41.135Z	FINCOMING
2021-08-15T08:19:59.2Z	FINCOMING
2021-08-15T08:19:59.2Z	FINCOMING
2021-08-15T08:19:15.19Z	FINCOMING
2021-08-15T08:19:15.19Z	FINCOMING
2021-08-15T08:19:29.89Z	FINCOMING
2021-08-15T08:19:29.89Z	FINCOMING









[illegible]



2022-12-11T19:58:04.915Z	IF OUTGOING	[REDACTED]	ياخي ايش قرارك بوضوح والانسب من حيث احلك ؟	What is your decision with regards to your sister? The most suitable
2022-12-11T20:01:30.351Z	IF OUTGOING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-11T20:02:16.597Z	IF OUTGOING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-11T20:02:54.706Z	IF OUTGOING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-11T20:08:48.017Z	IF OUTGOING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-11T20:07:14.985Z	IF OUTGOING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-11T20:09:35.056Z	IF OUTGOING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-11T20:11:57.724Z	IF OUTGOING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-11T20:13:43.343Z	IF OUTGOING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-11T20:14:01.474Z	IF OUTGOING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-11T20:16:23.576Z	IF OUTGOING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-11T20:16:51.642Z	IF OUTGOING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-11T20:22:18.740Z	IF OUTGOING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-11T20:22:55.802Z	IF OUTGOING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-11T20:25:11.751Z	IF OUTGOING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-11T20:25:26.081Z	IF OUTGOING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:41:55Z	IF INCOMING	[REDACTED]	أودو	أودو
2022-12-12T00:42:04Z	IF INCOMING	[REDACTED]	حلا	حلا
2022-12-12T00:42:28Z	IF INCOMING	[REDACTED]	الآن اقم اخوتك	الآن اقم اخوتك
2022-12-12T00:43:28Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:43:17Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:49:40Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:49:27Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:47:40Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:49:06Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:48:38Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:49:24Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:50:36Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:50:40Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:50:50Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:51:43Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:52:26Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:52:46Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:53:12Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:53:16Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:53:45Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:54:10Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:55:41Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:55:41Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:57:13Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:57:18Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T00:58:55Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:01:35Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:04:40Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:04:43Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:08:02Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:08:44Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:10:36Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:11:17Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:11:36Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:12:27Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:12:51Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:13:53Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:15:31Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:16:40Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:18:28Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:19:15Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:20:57Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:21:15Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:21:39Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:22:14Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:23:38Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:23:41Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]
2022-12-12T01:24:44Z	IF INCOMING	[REDACTED]	[REDACTED]	[REDACTED]

key

سجل

INCOMING

2022-12-12T01:25:56Z